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November 19, 2021

The Honorable William F. Kuntz
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Benhayun v. Halsted Financial Services, LLC et al.
Civil Case No. 1:21-cv-04421-WFK-SIL

Dear Judge Kuntz,

We represent the Plaintiff, Sami Benhayun, in the above referenced matter. We write to respectfully request an extension to respond to the Motion to Dismiss filed by Defendants Halsted Financial Services, LLC (“Halsted”) and LVNV Funding, LLC (“LVNV”). The original and current Ordered date for Plaintiff’s response is November 26, 2021. Plaintiff’s newly proposed response date is December 10, 2021, which represents a fourteen (14) day extension from the original due date. Additionally, Plaintiff requests that any reply from the Defendant be due on January 7, 2022.

This is Plaintiff’s first request for an extension. Prior to filing this motion, Plaintiff contacted counsel for Defendant, who consented to this request.

We thank the Court for its kind courtesies and considerations.

Respectfully submitted,

/s/ Uri Horowitz

Uri Horowitz

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Attorney for Plaintiff

CC: All Counsel of Record via ECF